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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 11-0440 MMC
Plaintiff,	)	STIPULATION REQUESTING
v.	)	PROTECTIVE ORDER, AND
	)	<del>PROPOSED</del> ORDER
VICTOR SANTOS,	)	
Defendant.	)	

The parties respectfully stipulate as follows:

1. The United States expects to call Fingerprint Specialist Angela Pratt as a witness at trial in the above-captioned case .

2. Angela Pratt has an allegation of misconduct against her relating to her time and attendance while employed at the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). The United States would like to provide materials related to this allegation (the Protected Material) to defendant in advance of trial. The parties agree that it is appropriate to restrict disclosure of the Protected Material solely to defendant, defendant's counsel, and any other member of defendant's trial teams, including the investigative firm or any expert witnesses

1 assisting in the preparation of the defense, in the above captioned matter and solely for use in  
2 preparing for and conducting the trial of the above-captioned matter. The parties agree that the  
3 persons described in the previous sentence should be barred from distributing the Protected  
4 Material to any other person or entity. Such persons are also barred from using it for any  
5 purpose other than trial in the above-captioned matter.

6 4. The parties respectfully ask the Court to enter a protective order consistent with  
7 this stipulation. A proposed order is set out below.

8  
9 IT IS SO STIPULATED.

10  
11 MELINDA HAAG  
United States Attorney

12 DATED: July 10, 2012

13 /s/  
CYNTHIA M. FREY  
Assistant United States Attorney

14  
15 DATED: July 10, 2012

16 /s/  
STEVE TEICH  
Attorney for VICTOR SANTOS

**~~PROPOSED~~ ORDER**

Upon consideration of the parties' stipulated request for a protective order, the Court hereby enters the following order:

The United States shall disclose forthwith to defendant's counsel the material relating to an allegation of misconduct against Angela Pratt relating to her time and attendance while employed at the Bureau of Alcohol, Tobacco, Firearms and Explosives (the Protected Material). Disclosure of the Protected Material shall be restricted to defendant, defendant's counsel, and any other members of defendant's trial team in the above-captioned matter. These specified individuals may use the Protected Material solely for purposes of trial in the above-captioned matter and are barred from disclosing it to any other person or using it for any other purpose.

IT IS SO ORDERED.

DATED: July 11, 2012

  
HONORABLE MAXINE M. CHESNEY  
United States District Judge